



Aviva Canada Inc. 10 Aviva Way, Suite 100, Markham, ON, L6G 0G1 Tel: +1 (800) 387 4518 www.avivacanada.com

November 3, 2020

Mr. Mark White
Chief Executive Office
Financial Services Regulatory of Ontario (FSRA)
North York, Ontario M2N 6L9

Dear Mr. White:

Re: FSRA Draft 2021-2022 Priorities and Budget

Aviva Canada Inc. ("Aviva") thanks the Financial Services Regulator Authority of Ontario (FSRA) for the opportunity to comment on its *2021-2022 Proposed Priorities and Budget*. It has been a challenging year for FSRA, given the tremendous upheaval and pivoting that has been required during the COVID-19 pandemic. We appreciate that FSRA displayed flexibility while maintaining rigor – and still kept pace with its strategic priorities moving forward.

Reading the *Proposed Priorities* document, we see the pillars of *Protecting Public Interest, Innovation, Consumer Education and Engagement, and Data Analytics and AI* all have very reasonable key outcomes and deliverables outlined. The plan looks well considered and promising.

That being said, our purpose in writing this response is to point out what we consider to be a gap or key opportunity for FSRA. In order to be a pro-active and forward-looking regulator, FSRA needs to have a better overview of what is going on in the market. The data strategy includes methods of getting a better sense of the outputs and activities but does not help FSRA to understand emerging trends. Understanding emerging trends will allow FSRA to identify cost drivers earlier and develop solutions and recommendations for the Ministry of Finance. This in turn, will enable FSRA to take action earlier and stabilize rates for consumers.

We recommend that FSRA establish an insurer advisory group whose focus is on cost drivers and trends and possible solutions. The frequency, transparency and terms of reference can be determined later, but we propose that this could be a solution to help FSRA have better foresight so that it can be a more active guardian of the marketplace.

We posit that this recommendation rounds out the objectives of public interest/consumer interest, as the intention is on rate stabilization and giving FSRA more insight and transparency into insurer's experience, market health and improved supervisory efficiency and support.

Aviva appreciates the transparency with which FSRA conducts its activities. The model of collaboration and consultation, engaging and empowering consumers is a good formula. We are definitely stronger pooling our collective expertise and insight to achieve greater results. Although this has been a challenging year, we hope that 2021-2022 will continue on a strong footing.

We remain available for any further questions.

Aviva Canada Inc.

Erica Kelsey
AVP, Government Relations
Erica.kelsey@aviva.com